

# **SEMI-ANNUAL COMPLIANCE STATUS REPORT**

*Prepared for:*

**United States Department of Justice  
Washington, D.C.**

**U.S. Environmental Protection Agency - Region 6  
Dallas, Texas**

**U.S. Environmental Protection Agency – Region 7  
Kansas City, KS**

*Prepared by:*

**Plains All American Pipeline, L.P.  
Houston, Texas**

**October 8, 2013**

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## **Attachments**

### **Attachment A**

#### **Status of Action Plan Development and Implementation under the Risk Management Program (RMP)**

- **Attachment A-1: Risk Screening Program Action Plan Creation Report Card**
- **Attachment A-2: Action Plan Element Implementation Status**

## **1.0 Introduction**

### **1.1 Report Purpose**

This Semi-Annual Compliance Status Report has been prepared in compliance with Provision VI (Reporting Requirements) of the Consent Decree between the United States Environmental Protection Agency (EPA) and Plains All American Pipeline et al. al. (Plains) having an Effective Date of September 20, 2010. This provision of the Consent Decree requires that a semi-annual report be submitted to the United States Department of Justice and EPA Regions 6 and 7 summarizing the status of Plains' efforts towards compliance with Section V (Compliance Requirements) of the Consent Decree as well as the other specific reporting requirements of Section VI.

### **1.2 Report Organization**

The Semi-Annual Compliance Status Report sections are generally organized to follow the requirements of Section V (Compliance Requirements) of the Consent Decree. The reporting requirements of Section VI are addressed as specified by the Consent Decree within these report sections. For the purposes of this report, the capitalized term "Pipeline or Pipelines" has the definition presented in Sub-Paragraph III.9.Q. of the Consent Decree.

### **1.3 Period Covered by This Report**

The Consent Decree requires that a semi-annual report be provided to EPA by no later than six months after the Effective Date of the Consent Decree and every six months thereafter until the Consent Decree terminates. Under that requirement, the time period to be covered by the first semi-annual report would have been the six month period preceding the date of the report. This presented a logistical problem in ensuring that the semi-annual compliance status report provided data and certifications that covered the reporting period specified without missing the reporting deadline. The timing specified in the Consent Decree required that the end of the reporting period match the semi-annual report deadline, which left no time to compile the required reporting data or prepare the report.

This issue was the subject of a telephone call with EPA Region 6 on February 24, 2011. During that call, it was agreed that the period covered by the first Semi-Annual Compliance Status Report would be from the Effective Date of the Consent Decree (September 20, 2010) until the end of the month preceding the reporting deadline. It was also agreed that all subsequent semi-annual reports would be on the 20th of the month (March or September) and would cover the period from the end of the previous reporting period to the end of the month preceding the reporting deadline. This agreement was documented in a follow-up e-mail from Nelson Smith (EPA, Region 6).


This report covers the reporting period of August 1, 2013 to August 31, 2013, which is a period shorter than the six-month reporting period covered by previous reports. Plains submitted a Request for Termination per Section XVII of the Consent Decree concurrent with the last semi-annual compliance status report covering the period from March 1, 2013 to July 31, 2013. In accordance with a request by Nelson Smith (EPA Region 6), that abbreviated semi-annual report was prepared to cover the reporting period up to the request for termination date of July 31, 2013, and to accompany the Request for Termination. This abbreviated report has been prepared to cover the remaining month (August 2013) of that six-month reporting period.

#### **1.4 Total Miles of Pipeline Purchased, Acquired, or Sold**

During the reporting period covered by this Semi-Annual Compliance Status Report, and in accordance with Consent Decree Section VI, Sub-Paragraph 20.A., Item viii, Plains notifies the EPA that it did not acquire new Pipeline or sell any Pipeline.

## 1.5 Report Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on any personal knowledge I may have and my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

  
\_\_\_\_\_  
Mark J. Gorman, Executive Vice President

  
\_\_\_\_\_  
Date

## **2.0 Consent Decree Compliance Status (*Consent Decree Section V*)**

The following sections present a summary of the status of compliance with each of the Provisions of Section V of the Consent Decree (CD) as of February 28, 2013.

### **2.1 Enhanced Integrity Management and Corrosion Control**

#### **2.1.1 IMP Requirements for Category I, II-B and III-B Pipelines (CD Sub-Paragraph 15.A.)**

During the reporting period covered by this Semi-Annual Compliance Status Report, Plains has assessed, operated and maintained all Category I, Category II-B and Category III-B Pipelines in accordance with the requirements of Plains' Integrity Management Plan (IMP), subject to the requirements of sub-paragraph 15.G. of the Consent Decree.

#### **2.1.2 RSP Screening of Category II-A, III-A and IV Pipelines (CD Sub-Paragraph 15.B.)**

During the reporting period covered by this Semi-Annual Compliance Status Report, Plains has assessed, operated and maintained all Category II-A, Category III-A and Category IV Pipelines in accordance with the requirements of Plains' Risk Screening Program (RSP), subject to the requirements of sub-paragraph 15.G. of the Consent Decree.

During the reporting period covered by this Semi-Annual Compliance Status Report, Plains has developed and implemented Action Plans detailing risk mitigation actions to address the risks or other anomalies found during the RSP in accordance with the Risk Category Schedule in the RSP.

Plains maintains a database that tracks all pipeline segments subject to the RSP screening, their risk levels, the development of Action Plans and Elements and the implementation of the individual Action Elements. The Consent Decree requires that Plains report progress regarding the completion of any required milestones, including "...summaries of the RSP Action Plans required pursuant to sub-paragraph 15.B. and a description of actions taken pursuant to the RSP Action Plans during the



preceding six months.”

In this report, Plains provides summary tables that present a snapshot of the progress towards completion of Action Plans and Action Plan Elements developed under the RSP during the reporting period covered by this report. The first table (**Attachment A-1**) illustrates Plains’ progress towards the creation and approval of Action Plans emanating from the risk screening process. It is a report card that Plains uses to measure progress towards completion of required Action Plans based upon the initial risk screening and risk level assignment. This report card shows the number of Action Plans due to be completed during the reporting period (based upon the initial screening date and the risk level assignment, or subsequent reviews), the number completed, those instances where remedial measures were implemented in the event an Action Plan was not developed or approved within the program time limits, and the percent created and approved of the total due to be completed and approved. If the program is operating properly, this report card should show 100% completed and approved for each of the Districts for that reporting period.

A second summary table (**Attachment A-2**) is a listing of Action Plan Elements and the progress towards their completion. This table lists each Action Plan Element by its unique tracking number, the district, the pipeline segment name, risk level, the Action Plan Element Category, the status of the Action Plan Element, and the actual completion dates. As this is a dynamic process, the table presents only those action plan elements that are scheduled to be completed within the current semi-annual reporting period. As with the previous table, if the program is operating properly, at the end of each semi-annual reporting period, all of the Action Plan Elements due to be completed during that reporting period should have “CPL” (complete) noted under the status column.

### **2.1.3 Integrity Management of Category II and III Pipelines (CD Sub-Paragraph 15.C.)**

During the reporting period covered by this Semi-Annual Compliance Status Report, Plains has operated and maintained all Category II-A and Category III-A (Gathering) Pipelines in conformity with the safety requirements for rural gathering pipelines established in 49 CFR

195.11(b).

As of the Effective Date of the Consent Decree (9/20/10) and in accordance V.15.C.i.a. and b., Plains has:

- identified all Category II-A and III-A (Gathering) Pipeline Segments; and
- developed and implemented a continuing education program in conformity with 40 CFR 195.444.

As of July 3, 2010, Plains developed and implemented a corrosion control program in conformance with 49 CFR 195, Subpart H, in accordance with V.15.C.i.c.

As of the Effective Date of the Consent Decree (9/20/10) and in accordance V.15.C.ii.a., Plains identified all Category II-B and III-B (Low Stress) Pipeline Segments.

In accordance with V.15.C.ii.b., Plains completed baseline assessments required under Consent Decree provision V.15.C.ii.b. based on the total mileage of Category II-B and III-B Pipeline. As discussed in the previous semi-annual compliance status report dated March 15, 2011, baseline assessments were completed on 72.6% of the Category II-B and III-B Pipeline operated by Plains as of January 3, 2011. This complied with the Consent Decree requirement that baseline assessments be completed at least 50% of the Category II-B and III-B Pipelines by January 3, 2011.

In the Semi Annual Compliance Status Report dated March 20, 2012, Attachment C (Summary of Baseline Assessment Status Through February 29, 2012 for Category II-B and Category III-B Pipeline Segments) provides a summary table listing the Pipeline segments covered by this provision of the Consent Decree and the status of baseline assessments for those segments through February 29, 2012. As of February 29, 2012, baseline assessments had been completed on 100% of the Category II-B and III-B Pipeline segments operated by Plains as of the Effective Date of the Consent Decree (September 20, 2010), and has therefore complied with Sub-Paragraph V.15.C.ii.b. of the Consent Decree well in advance of the July 3, 2013 deadline.

**2.1.4 New Pipeline Acquisitions  
(CD Sub-Paragraph 15.D.)**

During the period covered by this report (August 2013), Plains acquired no new segments of Pipeline.

The previous semi-annual compliance status report dated August 2, 2013 noted the acquisition of two segments of Category IV during that reporting period. These segments are subject to RSP screening under Plain's RSP within 12 months of acquisition. They were acquired on April 14, 2013 and May 24, 2013, so must be screened by April 14, 2014 and May 24, 2014 respectively.

**2.1.5 Geographic Information Systems (GIS) Mapping  
(CD Sub-Paragraph 15.E.)**

Plains completed initial digital mapping and Centerline Verification of all Pipelines operated by Plains as of May 1, 2010. Initial digital mapping and Centerline Verification of these Pipelines was completed by July 1, 2010.

**2.1.6 Anode Beds, Internal Corrosion Control and Close Interval  
Surveys (CD Sub-Paragraph 15.F.)**

In the Semi-Annual Compliance Status Report dated September 20, 2012, it was concluded that (after making certain reporting corrections in that report) Plains had completed all of the requirements of, and well within the deadlines specified in Sub-Paragraph 15.F. of the Consent Decree.

**2.1.7 Subsequent Revisions to Plains' IMP or RSP  
(CD Sub-Paragraph 15.G.)**

No material changes to Plains' IMP or RSP have been made during the reporting period.

## **2.2 Enhanced Pipeline Leak Detection (Consent Decree Paragraph 16)**

### **2.2.1 Weekly Aerial Patrols (CD Sub-Paragraph 16.A.)**

All active Category I, II-A, II-B, and III-B Pipelines (including all Category I, II-A, II-B and III-B Pipeline acquired since the September 20, 2010) and those active Pipelines listed in Appendix A of the Consent Decree have been the subject of a weekly aerial, motor vehicle or foot patrol (weather permitting) in accordance with the requirements of Sub-Paragraph 16.A. of the Consent Decree.

### **2.2.2 Implementation of API 1130 Compliant CPM Detection (CD Sub-Paragraph 16.B.)**

All active (in service) Pipeline segments listed in Appendix B of the Consent Decree complied with the performance standards for Computational Pipeline Monitoring (CPM) Leak Detection set forth in API RP 1130 at the end of the March 1, 2011 to August 31, 2011 reporting period and as presented in the September 19, 2011 Semi-Annual Compliance Status Report. In addition, during that reporting period, Plains identified 30 additional Pipeline segments for installation of CPM equipment as required by Sub-Paragraph V.16.C.1 of the Consent Decree. As of the end of the March 1, 2011 to August 31, 2011 reporting period and as presented in the September 19, 2011 Semi-Annual Compliance Status Report, all of these 30 additional pipeline segments complied with the performance standards for Computational Pipeline Monitoring (CPM) Leak Detection set forth in API RP 1130. This was well in advance of the December 31, 2011 deadline stipulated by Sub-Paragraph V.16.C.1 of the Consent Decree.

### **2.2.3 Enhancement of API 1130 Compliant CPM Leak Detection and Minimization of Slack-Line Operations (CD Sub-Paragraph 16.C.)**

The Consent Decree requires that an investigation of specific Pipeline Segments listed in Appendix B of the Consent Decree (as well as any

Segments added to the Computation Pipeline Monitoring pursuant to Sub-Paragraph 16.B.) be the subject of an investigation that is designed to identify potential enhancements to Plains' leak detection capabilities and measures to minimize Slack-Line Operations or mitigate the effects of Slack-Line Operations on the CPM leak detection systems on those Pipeline Segments.

It also requires that Action Plans be developed based upon the findings of the investigations described above, which will include one or more of the measures identified in 16.C.i.b.5. and any other actions Plains may take to improve the leak detection system and/or minimize Slack-Line Operations.

The following sections summarize Plains' activities conducted in compliance with these requirements.

#### **2.2.3.1 Investigation**

As documented in previous semi-annual reports, Plains completed the investigations specified in Sub-Paragraph V.16.C.i. evaluating the extent of Slack-Line Operations for all active (in service) Pipeline segments listed in Appendix B of the Consent Decree and the 30 additional pipeline segments as required by Sub-Paragraph V.16.B. of the Consent Decree by the December 31, 2011 deadline (Sub-Paragraph V.16.C.i.). Plains also migrated each of these segments to the Telvent Oasis DNA Pipeline Monitoring (PLM) CPM application used in Plains' Midland, TX Operational Control Center in accordance with Sub-Paragraph V.16.C.i.a. of the Consent Decree.

#### **Action Plans**

Plains developed Action Plans based upon the findings of the investigations discussed in the previous section in accordance with Sub-Paragraph V.16.C. of the Consent Decree. Of the 110 Pipeline segment investigations conducted between May 3, 2010 and September 1, 2011 (80 segments from Appendix B and 30 additional segments identified by Plains), a total of 26 concluded that no action need be taken. The remaining 84 Pipeline segment investigations concluded that an Action

Plan needed to be developed and implemented. As documented in previous semi-annual reports, all 84 Action Plans were developed between May 3, 2010 and December 5, 2011, well in advance of the March 31, 2012 deadline stipulated in Sub-Paragraph V.16.C.ii. of the Consent Decree. Implementation of all 84 Action Plans was completed between May 3, 2010 and February 27, 2013.

As of February 28, 2013, implementation of the Action Plans required by Sub-Paragraph V.16.C.ii. of the Consent Decree had been completed on the Appendix B pipeline segments and the 30 additional pipeline segments selected by Plains. Plains has therefore complied with all of the requirements of Sub-Paragraph V.16. of the Consent Decree.

## **2.3 Requirements for Replacement and/or Substitute Breakout Tanks (Consent Decree Paragraph 17)**

Plains complies with the requirements of this paragraph of the Consent Decree through its Management of Change (MOC) process. A Management of Change (MOC) form is required for any activity requiring the use of a substitute or breakout tank. If a substitute or breakout tank is required, an evaluation of the substitute or breakout tank storage volume adequacy and an evaluation of the adequacy of the secondary containment must be reviewed and verified by those Plains personnel approving the MOC form.

## **2.4 Personnel and Training (Consent Decree Paragraph 18)**

### **2.4.1 Position Preservation (CD Sub-Paragraph 18.A.)**

During the reporting period covered by this semi-annual report, Plains has staffed and preserved the positions listed in Sub-Paragraph V.18.A of the Consent Decree.

### **2.4.2 Employee Training (CD Sub-Paragraph 18.C. and 18.D.)**

During the reporting period covered by this semi-annual report, all

personnel assigned to operate and maintain Category III-A and IV Pipelines have been trained or maintained their training in conformity with the Operator Qualification requirements of 40 CFR 195.

During the reporting period covered by this semi-annual report, no new pipeline controller applicants were pre-screened using a computer simulator-based console operator assessment (Cobra).

As of December 31, 2010 Plains has trained field personnel performing Pipeline maintenance in proper Pipeline cleaning techniques and procedures. As new employees are hired this training is included in their on-going training.

## **2.5 Permits (Consent Decree Paragraph 19)**

No federal, state or local permit or approval was required to fulfill any compliance obligation in Section V of the Consent Decree during the reporting period of this report that would require, or have the potential to require Plains to seek relief under the provisions of Section VIII (Force Majeure) of the Consent Decree.

### **3.0 Compliance Problems During the Reporting Period**

#### **3.1 Problems Identified During the Reporting Period**

No problems were identified during the reporting period.

#### **3.2 Implemented or Planned Solutions to Problems Identified During the Reporting Period**

As no problems were identified during the reporting period, no implemented or planned solutions to problems were needed.



## **4.0 Consent Decree Violations or Force Majeure Events**

During the reporting period covered by this Semi-Annual Compliance Status Report, no Consent Decree violations or Force Majeure Events occurred.

## **ATTACHMENT A-1**

**Status of Action Plan Development and Implementation under  
the Risk Management Program (RMP)  
Risk Screening Program Action Plan Creation  
Report Card**

**RSP District Report Card**  
**Supplement Report**  
**Reporting Period: 08/01/2013 - 08/31/2013**

<i>(Plan Preparation &amp; Approval)</i>					
<b>ACTION PLAN CREATION - Number of Action Plans to create &amp; approve for this Reporting Period</b>					
<b>District</b>	<b>Due for Creation</b>	<b>Approved on Time</b>	<b>Remedial Action Taken or Approved within 30 Days</b>	<b>% Created &amp; Approved w/ in Program Guidelines</b>	<b>Comments</b>
Abbeville	1	1	0	100%	
Bakersfield	0	0	0	100%	
Belfield	50	49	0	98%	Mosser 2-22, Risk Level III, AP was created on 8/14/12, no APE's added, initial reporting query definition did not identify, issue being evaluated/resolved. APE to add biocide was in works and was completed on 9/18/13
Casper	1	1	0	100%	
Colorado City	5	5	0	100%	
Corpus Christi	3	3	0	100%	
Cushing	1	1	0	100%	
Cushing Terminal	0	0	0	100%	
East Cst Terminal	0	0	0	100%	
Evanston	0	0	0	100%	
Heidelberg	1	1	0	100%	
Kilgore	2	2	0	100%	
Long Beach	0	0	0	100%	
Midland Basin	0	0	0	100%	
Permian E	18	18	0	100%	
Permian N	1	1	0	100%	
Permian S	0	0	0	100%	
Russell	4	4	0	100%	
Wichita Falls	0	0	0	100%	
<b>Totals</b>	<b>87</b>	<b>86</b>	<b>0</b>	<b>99%</b>	

## **ATTACHMENT A-2**

**Status of Action Plan Development and Implementation under  
the Risk Management Program (RMP)  
Action Plan Element Implementation Status**

PEs Completed

Generated By:

Richard Bayle

Gains All American Pipeline, L.P.

8/9/2013 1:45 PM

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Show: All rsp action plans elements

Date Field: Actual Completion Date equals Custom (8/1/2013 to 8/31/2013)

AP Status equals CPL

Action Plan Element	District Name	Pipeline Segment Name	Risk Level	AP Element Category	AP Status	Actual Completion Date
48597	Bakersfield	Dehy 20 to Belridge (Line 910)	IV	Conduct ILI	CPL	8/1/2013
678	Belfield	BSMU 32-01 ML 6" Inactive Lateral Tie Ins (4)	III	Idle Isolate Purge	CPL	8/30/2013
4664	Belfield	BSMU 32-01 ML 6"	III	Rehab or Replace Pipe	CPL	8/30/2013
90186	Belfield	Headington 43X-25B	III	Conduct Risk Review	CPL	8/27/2013
90187	Belfield	Whiplash Gizmo	III	Conduct Risk Review	CPL	8/27/2013
71429	Belle Chasse	Bay St Elaine to Cocodrie	III	Conduct ILI	CPL	8/15/2013
90234	Colorado City	Sahara MM Edwards	III	Evaluate & Enhance Inhibitors or Biocides	CPL	8/6/2013
90196	Colorado City	Canon WT 24 to WT 25	IV	Idle Isolate Purge	CPL	8/29/2013
90197	Colorado City	Canon WT 24 to WT 25	IV	Idle Isolate Purge	CPL	8/29/2013
61372	Corpus Christi	Ingleside Dock Line 10"	III	Conduct ILI	CPL	8/19/2013
34174	Corpus Christi	Ingleside Dock Line 12"	III	Conduct ILI	CPL	8/19/2013
84473	Corpus Christi	Chyenne 8" (Route ID 14193)	II	Evaluate & Enhance CP	CPL	8/14/2013
84467	Corpus Christi	Alexander Ranch 6" (Route ID 14211)	III	Evaluate & Enhance CP	CPL	8/12/2013
84463	Corpus Christi	Lewis 18H 4" (Route ID 14210)	III	Evaluate & Enhance CP	CPL	8/12/2013
84470	Corpus Christi	Wright Ranch 8" (Route ID 14188)	III	Evaluate & Enhance CP	CPL	8/14/2013
3989	Cushing	Stockholm to Blaine	III	Conduct ILI	CPL	8/14/2013
67038	Evanston	Chevron E (LaBarge Gath)	III	Other	CPL	8/6/2013
67044	Evanston	Burley to Ellingford Jct	III	Other	CPL	8/13/2013
67047	Evanston	Meritt East Anshutz to Wahsatch	III	Conduct Risk Review	CPL	8/23/2013
67039	Evanston	GRB-2 (LaBarge Gath)	III	Other	CPL	8/7/2013
3938	Evanston	Russ Jct to LaBarge Station	III	Rehab or Replace Pipe	CPL	8/8/2013
47167	Heidelberg	Cranfield CO2 6"	IV	Rehab or Replace Pipe	CPL	8/29/2013
90244	Permian E	Blalock South Inactive Lateral	IV	Verify Idle Purged & Disconnected.	CPL	8/28/2013
90230	Permian E	Powell 9A	IV	Determine Long Term Operational Plan	CPL	8/30/2013
90231	Permian E	Powell 17F	IV	Determine Long Term Operational Plan	CPL	8/30/2013
84385	Permian E	Daniels Line (Cable Gathering)	IV	Idle Isolate Purge	CPL	8/27/2013
84384	Permian E	Merchant Unit Gathering (Cable Gathering)	IV	Idle Isolate Purge	CPL	8/27/2013
84386	Permian E	CW Merchant	IV	Idle Isolate Purge	CPL	8/27/2013
90228	Permian E	Powell 11F	III	Determine Long Term Operational Plan	CPL	8/30/2013

PE's Completed

Generated By:

Richard Bayle

owns All American Pipeline, L.P.

8/9/2013 1:45 PM

Entered By:

Show: All rsp action plans elements

Date Field: Actual Completion Date equals Custom (8/1/2013 to 8/31/2013)

AP Status equals CPL

Action Plan Element	District Name	Pipeline Segment Name	Risk Level	AP Element Category	AP Status	Actual Completion Date
84383	Permian E	Cauble Discharge w/ Laterals (Cauble Gathering)	IV	Idle Isolate Purge	CPL	8/27/2013
84387	Permian E	Merchant Pioneer 63 (Cauble Gathering)	IV	Idle Isolate Purge	CPL	8/27/2013
90232	Permian E	Powell 20A 23DT 21B	IV	Determine Long Term Operational Plan	CPL	8/30/2013
90227	Permian E	Blalock to ML	IV	Determine Long Term Operational Plan	CPL	8/30/2013
4432	Permian E	Pembrook Tie In to Upton Sta	III	Rehab or Replace Pipe	CPL	8/29/2013
90229	Permian E	8 13D to ML tie in	IV	Determine Long Term Operational Plan	CPL	8/30/2013
90139	Permian E	Waddell W 290 - 6"	IV	Idle Isolate Purge	CPL	8/30/2013
90233	Permian E	Powell 21B 33D to ML Tie in	IV	Determine Long Term Operational Plan	CPL	8/30/2013
72946	Permian E	Pioneer No1 LACT to Mabee Sta	II	Rehab or Replace Pipe	CPL	8/2/2013
47175	Permian N	Sands Station to Munger Station	II	Conduct ILL	CPL	8/28/2013
44228	Permian S	Arrowhead Greyburg (AGU) 4"	III	Determine Long Term Operational Plan	CPL	8/30/2013
104460	Permian S	Livingston Ridge to Lynch	IV	Conduct ILL	CPL	8/27/2013
90299	Permian S	Cummins Deep to Goldsmith	I	Determine Long Term Operational Plan	CPL	8/30/2013
47164	Russell	Pleasant Ridge to Bemis ML	III	Conduct ILL	CPL	8/27/2013
81484	Russell	White AP	IV	Idle Isolate Purge	CPL	8/30/2013

Grand Totals (44 records)

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